Restricting access to records in CareFirst and HPERM

Practice guidance for Adults and Childrens (including Adoption) services

1.0 Introduction

Access to electronic records is granted to allow individuals to fulfil the specific requirements of their role. Access to any record which is outside the requirements of the role may be considered misconduct.

In addition it is possible to restrict access to a person's record via CareSecure. This should only be applied in exceptional circumstances, where senior managers within the operational service relevant to the record, have authorised the restriction.

Restricting access to records should be maintained for the minimum period that will provide the protection required to the person who is the subject of the record. All restrictions, except where a child has been placed for adoption, will be reviewed.

2.0 Restrictions

The restriction where authorised will apply to records held in both CareFirst and HPERM.

When a record has been restricted, only the nominated staff members who have been given access to the record will be able to see it. In CareFirst, other workers will only be able to see the CareFirst Id and a line where the name and address details would be. In HPERM, other workers will be able to see the name and CareFirst Id of the client as well as the list of documents, but they will not be able to open any of these. There will also be a message to say they do not have access to the record.

The Safeguarding Adult Team and Independent Reviewing Unit will retain access to all the restricted records that relate to their service area.

Personal data will be shielded when any management information data is produced which includes details from restricted records.

3.0 When to consider restricting a record

Requesting the restriction of a record should only be done in **exceptional circumstances**, and for one of the following reasons:

1. The death of a child where child protection concerns exist that require investigation.
2. The birth record of a child who has been placed for Adoption[1].
3. If requested by the subject of the record, where there is reason to believe that there would be a significant risk to their safety should unauthorised access to the record occur, or where information is of a confidential nature (e.g. issues of domestic violence, witness protection)

[1] Restriction of access to records will be applied in all cases at the point where adoption is approved.

4. Where the case is highly sensitive or of a confidential nature, such as **a specific** Child Protection or Adult Safeguarding case (e.g. where a member of staff is identified during a safeguarding investigation).
5. If an employee is also a service user or carer and wishes their information to be restricted. Restrictions for this reason will **only** be considered where the situation is deemed complex and/or of a sensitive nature, and the standard restriction of individuals only accessing records in order to fulfil the specific requirements of their role is insufficient.

4.0 Process to request restriction

If a worker feels that restricting access to a person's record should be considered, this should be discussed and agreed with their line manager.

Once agreement has been received from their manager, an email should be sent to one of the authorising managers (see Appendix A) from the appropriate operational service. The email should request approval to restrict access to the person's record, state the reason why the restriction is being sought and include brief details to support the request. For children's adoption records, a worker can instead complete the 'Application to restrict an Adoption record' form.

Once authorisation has been received, the worker should complete and submit the appropriate CareSecure request form using ICT Self Service. Instructions on how to complete the request form are available here.

Please note: When completing the CareSecure request form, the following **must** be included;

- Details of the record to be restricted and the reason why the restriction is being sought.
- The CareFirst Id, name and role of each worker, manager, member of business support and / or finance who needs access to the record. If they are not named, they will not be able to see or update the record on CareFirst, or be able to view and/or save documents to the person's HPERM record.
- The name and role of the worker who will review the restriction, and the timescale for the review.
- The authorisation received from one of the authorising managers from the appropriate operational service. This can be achieved by attaching the email containing the authorisation (or 'Application to restrict an Adoption record' form if appropriate) to the end of the submitted request form. Instructions on how to do this are available here.

Failure to provide any of the above information will result in a delay to the processing or the rejection of the request.

5.0 Reviewing the restriction

At review the identified worker, in discussion and agreement with their line manager, should determine what will happen regarding the record restriction.

The review should conclude with a recommendation to **maintain, change or end** the restriction.

If **maintaining a restriction**, the name and role of the worker who will re-review the restriction and the timescale for the next review needs to be agreed and confirmed to ICT. To confirm the information, the worker should complete and submit the appropriate CareSecure request form using ICT Self Service.

If **changing** or **ending** a restriction, workers should follow the guidance in section 6.0.

6.0 Process to remove restriction or change the list of staff that have access to a restricted record

Workers must follow the same authorisation process as for new requests;

- Discuss and agree with their line manager,
- Obtain authorisation from one of the authorising managers from the appropriate operational service
- Complete and submit the appropriate CareSecure request form using ICT Self Service, ensuring all required information is provided.

Failure to provide any of the required information will result in a delay to the processing or the rejection of the request.

7.0 Urgent requests

If there is an urgent requirement to restrict or amend access to a record, the worker should agree this with their line manager and complete/submit the appropriate CareSecure request form using ICT Self Service. The worker will then need to phone the ICT Service Desk on x2222 (selecting option 2), and alert them to the urgency of the restriction request submitted. After authenticating the caller, ICT Services will then process the request ASAP.

Following the above, the worker **must** obtain formal authorisation for the request from one of the authorising managers from the appropriate operational service. Once authorisation has been received the worker must update their submitted request, by attaching the email containing the authorisation (or 'Application to restrict an Adoption record' form if appropriate). Instructions on how to do this are available here. The evidence of the formal authorisation for the request **must** follow within **3 working days** or the restriction will no longer apply.

8.0 Gaining access to a restricted record

If you require access to information within, or to add information to, a restricted record, you should contact the ICT Service Desk on x2222 (selecting option 2) to request confirmation of the key contact worker with access to the record. You should then contact that worker to obtain the information you need or to arrange for the access to the record to be changed so that you can view or add to it.

9.0 Override facility

Staff in the following teams have access to a facility to override the record restriction in CareFirst to view the case details if required.

- Emergency Duty Team
- Multi Agency Safeguarding Hub (MASH) (managers only)
- Management Information
- ICT Social Care System Service Support

Each time this facility is used, a valid reason and full explanation for accessing the record **must** be recorded. CareFirst automatically records access to any restricted file.

10.0 Monitoring restricted records

Several reports will be available from CareFirst to help monitor restricted records.

Report 1: Lists all records that have been restricted. This report is produced on an operational service basis and contains details of:

- When the record was restricted
- Who authorised restriction
- The reason for restriction
- The name and role of the worker who will review the restriction
- The date when the restriction will be reviewed.

This report will be made available to the authorising managers from the appropriate operational service as required. Authorising managers will review the report and assure themselves that records shown should still be restricted, that reviews of restrictions are not overdue and that the number of restricted records is kept to a minimum.

This report will also be made available to the Information Governance Team on request, to ensure procedures are being followed correctly.

Report 2: For each restricted record it lists the details of the workers who currently and have historically had access to that record. This report will be made available to supplement the use of Report 1.

Report 3: Lists all restricted cases accessed using the override facility. This report will be made available to the Information Governance Team on request, and used to check for inappropriate access.

Appendix A – Authorising Managers

Children's Services (including Adoption)

- Head of Service
- Senior Managers
- Area Managers
- ICS Managers
- Adoption Manager
- Adoption Practice Managers

Adult Social Care

- Head of Adult Social Care
- Assistant Director Northern
- Assistant Director Eastern
- Assistant Director Southern
- Deputy Assistant Director

Please note:
A review of the authorising managers will be conducted on a six monthly basis via the appropriate Way We Work Group – Adults or Childrens.